

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:19-cv-02990-KBJ**

PROTECT DEMOCRACY PROJECT, INC. v. U.S.  
DEPARTMENT OF JUSTICE et al  
Assigned to: Judge Ketanji Brown Jackson  
Cause: 05:552 Freedom of Information Act

Date Filed: 10/04/2019  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**PROTECT DEMOCRACY  
PROJECT, INC.**

represented by **Rachel Goodman**  
PROTECT DEMOCRACY  
115 Broadway  
5th Floor  
New York, NY 10006  
202-997-0599  
Email: [rachel.goodman@protectdemocracy.org](mailto:rachel.goodman@protectdemocracy.org)  
**LEAD ATTORNEY**  
**PRO HAC VICE**  
**ATTORNEY TO BE NOTICED**

**Stephanie Schuster**  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
(202) 373-6595  
Email: [stephanie.schuster@morganlewis.com](mailto:stephanie.schuster@morganlewis.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Laurence M. Schwartztol**  
PROTECT DEMOCRACY PROJECT  
15 Main Street  
Suite 312  
Watertown, MA 02472  
202-945-2092  
Fax: 929-777-8428  
Email: [larry.schwartztol@protectdemocracy.org](mailto:larry.schwartztol@protectdemocracy.org)  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**U.S. DEPARTMENT OF JUSTICE**

represented by **Paul A. Mussenden**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW  
Washington, DC 20530  
(202) 252-2520  
Fax: (202) 252-2599  
Email: [Paul.Mussenden@usdoj.gov](mailto:Paul.Mussenden@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant**

**U.S. DEPARTMENT OF  
HOMELAND SECURITY**

represented by **Paul A. Mussenden**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
10/04/2019	<u>1</u>	COMPLAINT against U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. DEPARTMENT OF JUSTICE ( Filing fee \$ 400 receipt number 0090-6418739) filed by PROTECT DEMOCRACY PROJECT, INC.. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Civil Cover Sheet, # <u>3</u> Summons to U.S. Department of Justice, # <u>4</u> Summons to U.S. Department of Homeland Security, # <u>5</u> Summons to U.S. Attorney General, # <u>6</u> Summons to U.S. Attorney for the District of Columbia)(Schwartztol, Laurence) (Entered: 10/04/2019)
10/04/2019	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PROTECT DEMOCRACY PROJECT, INC. (Schwartztol, Laurence) (Entered: 10/04/2019)
10/09/2019		Case Assigned to Judge Dabney L. Friedrich. (zed, ) (Entered: 10/09/2019)
10/09/2019	<u>3</u>	SUMMONS (4) Issued Electronically as to U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. DEPARTMENT OF JUSTICE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zed, ) (Entered: 10/09/2019)
10/11/2019	<u>4</u>	Case randomly reassigned to Judge Ketanji Brown Jackson. Judge Dabney L. Friedrich is no longer assigned to the case. (ztnr) (Entered: 10/15/2019)
10/21/2019	<u>5</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Rachel E. Goodman, :Firm- Protect Democracy Project, Inc., :Address- 115 Broadway, 5th Floor, New York, NY 10006. Phone No. - 2025794582. Fax No. - 9297778428 Filing fee \$ 100, receipt number BDCDC-6466069. Fee Status: Fee Paid. by PROTECT DEMOCRACY PROJECT, INC. (Attachments: # <u>1</u> Declaration by Rachel E. Goodman, # <u>2</u> Text of Proposed Order)(Schwartztol, Laurence) (Entered: 10/21/2019)
10/21/2019	<u>6</u>	GENERAL ORDER AND GUIDELINES APPLICABLE TO FOIA CASES ASSIGNED TO JUDGE KETANJI BROWN JACKSON. The Court will hold the parties and counsel responsible for following these directives, and parties and counsel should pay particular attention to the Court's instructions for processing and production of records, batching motions, and filing exhibits. Failure to adhere to this Order may, when appropriate, result the imposition of sanctions and/or sua sponte denial of non-conforming motions. Signed by Judge Ketanji Brown Jackson on 10/21/2019. (jag) (Entered: 10/21/2019)
10/22/2019		MINUTE ORDER granting <u>5</u> Motion for Leave to Appear Pro Hac Vice. It is hereby ORDERED that Rachel E. Goodman is admitted pro hac vice in this matter as counsel for Plaintiff. <b>Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a). Click for instructions.</b> Signed by Judge Ketanji Brown Jackson on 10/22/2019. (JAG) (Entered: 10/22/2019)
10/28/2019	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 10/28/2019. Answer due for ALL FEDERAL DEFENDANTS by 11/27/2019. (Schwartztol, Laurence) (Entered: 10/28/2019)
10/28/2019	<u>8</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 10/28/2019. (Schwartztol, Laurence) (Entered: 10/28/2019)
10/28/2019	<u>9</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. U.S. DEPARTMENT OF HOMELAND SECURITY served on 10/28/2019 (Schwartztol, Laurence) (Entered: 10/28/2019)
10/28/2019	<u>10</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. U.S. DEPARTMENT OF JUSTICE served on 10/28/2019 (Schwartztol, Laurence) (Entered: 10/28/2019)
10/29/2019	<u>11</u>	NOTICE of Appearance by Rachel Goodman on behalf of PROTECT DEMOCRACY PROJECT, INC. (Goodman, Rachel) (Entered: 10/29/2019)
11/27/2019	<u>12</u>	NOTICE of Appearance by Paul A. Mussenden on behalf of U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. DEPARTMENT OF JUSTICE (Mussenden, Paul)

		(Entered: 11/27/2019)
11/27/2019	<u>13</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint, by U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order)(Mussenden, Paul) (Entered: 11/27/2019)
12/02/2019		MINUTE ORDER granting <u>13</u> Consent Motion for Extension of Time to Answer. It is hereby ORDERED that Defendants shall answer or otherwise respond to the complaint on or before 12/4/2019. Signed by Judge Ketanji Brown Jackson on 12/2/2019. (jag) (Entered: 12/02/2019)
12/02/2019	<u>14</u>	NOTICE of Appearance by Stephanie Schuster on behalf of PROTECT DEMOCRACY PROJECT, INC. (Schuster, Stephanie) (Entered: 12/02/2019)
12/04/2019	<u>15</u>	ANSWER to Complaint by U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. DEPARTMENT OF JUSTICE.(Mussenden, Paul) (Entered: 12/04/2019)
12/05/2019		MINUTE ORDER. Before the Court in this FOIA case are a complaint and an answer. It is hereby ORDERED that the parties shall review this Court's <u>6</u> General Order and Guidelines Applicable to FOIA Cases, and promptly confer and file a joint proposed schedule for disclosure or briefing motions for summary judgment, on or before 12/19/2019. Signed by Judge Ketanji Brown Jackson on 12/5/2019. (jag) (Entered: 12/05/2019)